

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS' NOTICE OF FILING COPIES OF
CORRESPONDENCE CONTAINING LINKS TO
NON-CONFIDENTIAL EXPERT REPORTS**

During the February 2, 2022, teleconference, the Court requested counsel provide a copy of Coalition Plaintiffs' email communication distributed chiefly to municipal and county election officials containing links to hosted copies of Dr. Halderman's and Dr. Appel's rebuttal declarations, as well as that of Coalition Plaintiff's own expert, Dr. Stark. In response, Coalition Plaintiffs attach to this Notice the Declaration of Marilyn Marks, with Exhibits A–E. These materials provide the form email that was sent on August 3, 2021, by Coalition for Good Governance, with all linked documents that no longer have active links.

As the State's filing noted yesterday, (Doc. 1302), certain links in the email are presently inactive. Ms. Marks's declaration explains that the links

automatically expired 180 days after their creation on August 3, 2021, according to a default setting of the ShareFile service that was selected when the links were created.

Ms. Marks's declaration also explains that Coalition for Good Governance sought and obtained confirmation from Curling Plaintiffs' counsel that the Halderman rebuttal report, which they had not designated as AEO or confidential under the protective order (Doc 477), was "not confidential at all" prior to drafting the email containing links both to that rebuttal report and to the non-confidential reports of Dr. Appel and Coalition's own expert, Dr. Stark.

Respectfully submitted this 3rd day of February, 2022.

/s/ Bruce P. Brown

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CERTIFICATE OF COMPLIANCE AND SERVICE

Pursuant to LR 7.1(D), I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14, and has been served on all counsel via the Court's electronic filing system.

This 3rd day of February, 2022.

/s/ Robert A. McGuire, III
Robert A. McGuire, III